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**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

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CURTIS TERRELL AND ANGELA  
TERRELL,

*Plaintiffs*

v.

JASON ALLGRUNN, MICHAEL  
BANTA, and JEFFERY HENDERSON,  
JR., individually and their official capacities  
as duly sworn officers with DeSoto Parish  
Sheriff's Office, JAYSON RICHARDSON,  
in his official capacity as Sheriff of DeSoto  
Parish only, and OLD REPUBLIC UNION  
INSURANCE COMPANY,

*Defendants*

**CIVIL ACTION NO. 5:20-CV-00999**

**JUDGE ELIZABETH E. FOOTE**

**MAG. JUDGE MARK HORNSBY**

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**MOTION FOR PARTIAL SUMMARY JUDGMENT**

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**NOW INTO COURT**, through undersigned counsel, come Plaintiffs, Curtis Terrell and Angela Terrell, who move this Court for partial summary judgment against Defendants pursuant to [Federal Rule of Civil Procedure 56](#). Plaintiffs Curtis Terrell and Angela Terrell now request that this Court grant partial summary judgment on their claims for Unlawful Search and Seizures in Violation of the Fourth Amendment and Fourteenth Amendment of the United States Constitution [42 U.S.C. § 1983](#) (Count 1) as to Mrs. Terrell, Excessive Force in Violation of the Due Process Clause of the Fourteenth Amendment [42 U.S.C. § 1983](#) (Count 2) as to both Plaintiffs, Interference with First Amendment Speech and Retaliation in Violation of the First and Fourteenth

Amendments of the United States Constitution 42 U.S.C. § 1983 (Count 4) as to Mrs. Terrell, as well as on the *Monell/Hinojosa* and Failure to Train/Supervise (Count 6), Intentional and Negligent Infliction of Emotional Distress and Negligence (Count 8), State Law False Imprisonment (Count 9), Respondeat Superior (Count 13), and Direct Action under Louisiana Revised Statute § 22:655 (Count 15) as to both Plaintiffs.

The grounds for this motion are set forth in the attached Statement of Uncontested Facts, in accordance with Federal Rule of Civil Procedure 56 and Local Rule 56.1, Memorandum in Support, and Exhibits, all of which are incorporated herein

WHEREFORE, Plaintiffs respectfully request that this Court grant their motion.

Respectfully submitted,

s/ Casey Denson

**Casey Rose Denson (La. Bar #33363)**

**Justine G. Daniel (La. Bar #36856)**

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s/ Howard Conday

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2022, a copy of the foregoing Motion for Partial Summary Judgment was filed electronically with the Clerk of Court via the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Casey Denson  
CASEY DENSON, ESQ.